

Dana L. Sullivan, OSB No. 944834
E-mail: dana@baaslaw.com
Kristine Lambert, OSB No. 010684
E-mail: kristine@baaslaw.com
BUCHANAN, ANGELI, ALTSCHUL
& SULLIVAN LLP
921 SW Washington St., Ste. 516
Portland, OR 97205
Telephone: 503.974.5015
Facsimile: 971.230.0337

Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LINDA HEDLUND,

Plaintiff,

v.

**BANKS FIRE DISTRICT #13; and FIRE
CHIEF RODNEY LINZ**, in his individual and
representative capacity,

Defendants.

Case No. 3:20-cv-01527-HZ

**STIPULATION FOR ENTRY OF
FINAL JUDGMENT**

STIPULATION FOR ENTRY OF FINAL JUDGMENT

Plaintiff Linda Hedlund (“Hedlund”) and Defendants Banks Fire District #13 (“Banks Fire District”) and Fire Chief Rodney Linz (“Linz”) hereby stipulate to the entry of Final Judgment attached as Exhibit 1 and state as follows:

1. On August 19, 2021, Hedlund filed Plaintiff’s Notice of Acceptance of Offer of Judgment (ECH 23) accepting Defendants’ Offer of Judgment served on her on August 18, 2021, in the amount of \$115,001.00 plus reasonable attorney’s fees and costs (ECH 21).

2. The parties agree that the \$115,001.00 due to Hedlund shall be paid as follows:
 - a. Economic Damages: \$ 51,750.45
 - b. Non-economic Damages: \$ 63,250.55
3. Defendants agree to pay to Buchanan, Angeli, Altschul & Sullivan, LLP, Hedlund's attorneys of record, an additional amount of \$135,000 for Hedlund's attorney's fees and costs.
4. Defendants agree to pay all sums due within 30 days of the date of the entry of the Final Judgment by this Court.

Dated: September 3, 2021

s/ Dana L. Sullivan

Dana L. Sullivan, OSB No. 94483
dana@baaslaw.com
BUCHANAN, ANGELI, ALTSCHUL
& SULLIVAN LLP
921 SW Washington St., Ste. 516
Portland, OR 97205
Telephone: 503.974.5015
Of attorneys for Plaintiff

s/ Ron Downs

Ron Downs, OSB No. 920530
rdowns@sdao.com
SPECIAL DISTRICTS ASSOCIATION
OF OREGON
P.O. Box 12613
Salem, OR 97309-0613
Telephone: 503-780-0847
Of attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **STIPULATION FOR ENTRY OF FINAL JUDGMENT** on the parties listed below, by the method indicated:

- ☐ Mailing with postage prepaid
- ☒ CM/ECF
- ☐ Hand-delivery
- ☐ Overnight delivery
- ☒ Email

to said person(s) a true copy thereof at her or her last-known address as indicated below.

Ron Downs
Special Districts Association of Oregon
P.O. Box 12613
Salem, OR 97309-0613
rdowns@sdao.com

DATED: September 3, 2021

BUCHANAN ANGELI ALTSCHUL
& SULLIVAN LLP
s/ Dana L. Sullivan

Dana L. Sullivan, OSB No. 94483
E-mail: dana@baaslaw.com
Kristine Lambert, OSB No. 010684
E-mail: kristine@baaslaw.com
Telephone: (503) 974-5015

CERTIFICATE OF SERVICE